

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Plaintiff/ Respondent,

Case No. 2:23-cr-20022

v.

Hon. Gershwin A. Drain

D-1 MOHAMED KAZKAZ,
D-2 ZIAD KHALEL,

Defendants,

NATIONAL RESTAURANT CHAIN NO. 1,

Petitioner.

**Ex Parte Application for Order Sealing Exhibits to National
Restaurant Chain No. 1's Supplemental Brief In Support of Their
Motion to Modify Post-Indictment Restraining Order and Release
Their Funds/Substitute Property**

NOW COMES the National Restaurant Chain No. 1, by and through
DAVID W. JONES, Attorney for Petitioner, and hereby applies to this Court
for an Order permitting National Restaurant Chain No. 1 to file the Exhibits to
their Supplemental Brief in Support of their Motion to Modify Post-Indictment
Restraining Order and Release their Funds/Substitute Property **under seal**,
because the Exhibits contain confidential, financial, sensitive, and proprietary
information regarding National Restaurant Chain No. 1's business.

Revealing this information and the subject of this investigation will cause irreparable harm to their business relationships, property, and reputation, which could lead to the collapse of the Company.

Conclusion and Relief

WHEREFORE, National Restaurant Chain No. 1 respectfully requests that this Court grant its request to seal the Exhibits in Support of National Restaurant Chain No. 1's Supplemental Brief in Support of their Motion to Modify Post-Indictment Restraining Order and Release their Funds/Substitute Property.

Respectfully Submitted,

SCHENK & BRUETSCH, PLC

/s/ David W. Jones

By: David W. Jones (P57103)

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Dated: April 26, 2023

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

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v.

Hon. Gershwin A. Drain

D-1 MOHAMED KAZKAZ,
D-2 ZIAD KHALEL,

Defendants,

NATIONAL RESTAURANT CHAIN NO. 1,

Petitioner.

**Brief in Support of Ex Parte Application for Order Sealing Exhibits to
National Restaurant Chain No. 1's Supplemental Brief In Support of
Their Motion to Modify Post-Indictment Restraining Order and
Release Their Funds/Substitute Property**

This brief supports National Restaurant Chain No. 1's Application for an Order Sealing the Exhibits to National Restaurant Chain No. 1's Supplemental Brief in Support of their Motion to Modify Post-Indictment Restraining Order and Release their Funds/Substitute Property. The Exhibits contain confidential, financial, sensitive, and proprietary information regarding National Restaurant Chain No. 1's business.

Revealing this information and the subject of this investigation will cause irreparable harm to their business relationships, property, and reputation, which could lead to the collapse of the Company. National Restaurant Chain No. 1's requests that the Court issue an Order sealing the Exhibits, whereupon they will be filed under seal.

Conclusion and Relief

WHEREFORE, National Restaurant Chain No. 1 respectfully requests that this Court enters the proposed Order Sealing the Exhibits.

Respectfully Submitted,

SCHENK & BRUETSCH, PLC

/s/ David W. Jones

By: David W. Jones (P57103)

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Petitioner.

**Order Sealing Exhibits to National Restaurant Chain No. 1's Supplemental Brief
In Support of Their Motion to Modify Post-Indictment Restraining Order and
Release Their Funds/Substitute Property**

This matter comes before the Court pursuant to National Restaurant Chain No. 1's Ex Parte Application for Order Sealing Exhibits to National Restaurant Chain No. 1's Supplemental Brief in Support of their Motion to Modify Post-Indictment Restraining Order and Release their Funds/Substitute Property. This Court has reviewed the pleadings submitted and being aware of the nature of the matter presented to it, and the stated need for sealing.

IT IS HEREBY ORDERED THAT the Exhibits to National Restaurant Chain No. 1's Supplemental Brief in Support of their Motion to Modify Post-Indictment Restraining Order and Release their Funds/Substitute Property shall be sealed until further order of this Court.

S/
HONORABLE GERSHWIN A. DRAIN
United States District Judge

Dated: